

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN THE MATTER OF THE SEIZURE OF)	<u>FILED UNDER SEAL</u>
ALL FUNDS ON DEPOSIT IN SOVEREIGN)	
BANK CHECKING ACCOUNT NUMBER)	Case No. 12-10226-DJC
38504831678, HELD IN THE NAME OF)	
JOHN KOSTA, DOING BUSINESS AS)	
JOHN KOSTA REAL ESTATE)	

MOTION TO SEAL

The United States, hereby moves to seal, pursuant to Local Rule 7.2, (1) this Motion to Seal; (2) the seizure warrant application; (3) the supporting Affidavit of United States Federal Bureau of Investigations Special Agent Stephen J. Kelleher; (4) the seizure warrant; (5) any ruling on this Motion; and (6) all related paperwork filed herewith until further order of this Court, with the exception of the copy or copies of the seizure warrants that are to be served on the owners or custodians of the property to be seized, and also with exception as to employees, contract employees, and agents of the United States Attorney's Office for the District of Massachusetts, and any law enforcement officers involved in the investigation.

As grounds, the government states that the public disclosure of the information contained in the listed documents could lead to efforts by the owners or possessors of the assets to transfer, place liens upon, deplete, or otherwise impair the forfeitability of the assets.

WHEREFORE, the United States respectfully requests that this Court impound the documents listed above until further Order of the Court. Moreover, the United States respectfully requests, pursuant to General Order 06-05 of the United States District Court for the District of Massachusetts, that it be provided with copies of all sealed documents that the United States Attorney has filed in the above-styled matter.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By:



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Dated: August 6, 2012

So Ordered



MARTIN B. BOWLER
United States Magistrate Judge

Date: August 6, 2012